

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MIRZA N. BAIG and
BLUE SPRINGS WATER CO.,

Plaintiffs,

v.

THE COCA-COLA COMPANY,

Defendant.

No.: 08 CV 04206

Judge: Gettleman

Magistrate Judge: Denlow

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

FILED
8-11-2010
AUG 11 2010

PLAINTIFFS' MOTION FOR ADDITIONAL TIME TO DEAL WITH DISCOVERY
ISSUES AND RETAIN COUNSEL

Plaintiffs Mirza N. Baig ("Mirza") and Blue Springs Water Co. ("Bluesprings") (collectively, "Plaintiffs"), *pro se*, respectfully request that all matters pending in this case be deferred, in particular, grants plaintiffs additional time to find new counsel and to respond to outstanding discovery issued by Defendant, stating as follows:

1. On June 16, 2010, Defendant, The Coca-Cola Company ("TCCC" or "Defendant"), served upon David Kiesler, Plaintiffs' attorney of record, Defendant's First Set Of Interrogatories To Plaintiffs And Defendant's First Request To Plaintiffs For Production Of Documents And Things.

2. To the best of Plaintiffs' knowledge and belief, at least until June 16, 2010, David Kiesler had been diligently prosecuting Plaintiffs' claims in this case.

3. However, since the first week in July 2010, Mirza was unable to contact Mr. Kiesler.

4. Mirza telephoned Mr. Kiesler's office every business day sentence since the first week in July 2010, but Mr. Kiesler had not answered the phone or return Mirza's telephone calls.

5. Mirza also went to Mr. Kiesler's office, a 161 N. Clark St., Suite 2575, Chicago, IL 60601, on 10 separate occasions since July 1, 2010, but Mr. Kiesler was never there. The

receptionist stated that she has not seen him in weeks.

6. Mirza also went to Mr. Kiesler's home address on or about July 12, 2010. However, Mr. Kiesler was not there.

7. The Illinois Attorney Registration and Disciplinary Commission was contacted to determine how to contact Mr. Kiesler. However, they had no further information.

8. On July 30, 2010, Mirza was able to contact Mr. Kiesler who has been ill and is unable to represent the Plaintiffs at this time. Mr. Kiesler made arrangements for Mr. Mirza to get all of Plaintiffs' files.

9. Plaintiffs' claims are meritorious and Plaintiffs are desirous of pursuing those claims.

10. Plaintiffs are not filing this motion for purposes of delay.

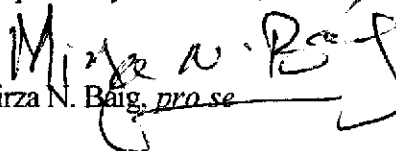
11. Plaintiffs do not feel that Kiesler will be able to recover in order to continue his representation of Plaintiffs within a reasonable time period.

12. Responses to outstanding discovery issued by Defendant are now overdue.

13. Plaintiffs need some time to retain alternate or additional counsel, to prosecute their claims and to respond to outstanding discovery.

WHEREFORE, Plaintiff's respectfully request that this Honorable Court grant additional time to retain alternate counsel and to respond to outstanding discovery and to suspend all action in this case for 45 days, to cure all defaults and for such other and further relief as this Honorable Court deems appropriate under the circumstances.

Respectfully submitted,


Mirza N. Baig, *pro se*

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NOTICE OF FILING/ CERTIFICATE OF SERVICE

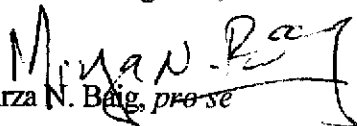
PLEASE TAKE NOTICE that on August ¹¹~~6~~, 2010, we caused to be filed in the United States District Court for the Northern District of Illinois Eastern Division, the attached PLAINTIFFS' MOTION FOR ADDITIONAL TIME TO DEAL WITH DISCOVERY ISSUES AND RETAIN COUNSEL, a copy of which is hereby served upon you. The undersigned, hereby certifies that he caused a true and correct copy of the Notice of Filing, by United States Postal Service, postage prepaid, at 4300 Di Paolo Center, Glenview, IL 60025, on August 6, 2010, before the hour of 5:00 p.m., upon the following:

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Attorneys for Defendant, THE COCA-COLA COMPANY

Executed: August 6, 2010


Mirza N. Baig, pro se